

# **Exhibit 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION**

Protect Our Parks, Inc.; Charlotte Adelman; )  
Maria Valencia and Jeremiah Jurevis; ) No. 18-cv-03424  
Plaintiffs, )  
v. ) Honorable John Robert Blakey  
Chicago Park District and City of Chicago, ) Jury Demanded  
Defendants. )

**PLAINTIFFS' FIRST SET OF INTERROGATORIES TO CITY OF CHICAGO**

Now come the Plaintiffs, Protect Our Parks, Inc.; Charlotte Adelman; Maria Valencia and Jeremiah Jurevis, through their undersigned attorneys, and pursuant to Rule 33 of the Federal Rules of Civil Procedure request that the Defendant, City of Chicago, answer the following Interrogatories within 30 days from service of this Plaintiffs' First Set Of Interrogatories To City Of Chicago.

**DEFINITIONS**

The term "person" refers to both natural persons and to corporate or other business entities, whether or not in the employ of the City of Chicago.

To "identify a person" means to state the person's name, business address and telephone number and, additionally, in the case of a natural person, his home address, employer, present occupation, job title and telephone number.

"You" or "yours" shall mean the City of Chicago.

**INTERROGATORIES**

1. Identify by name, title, address and telephone number, all persons answering these interrogatories.

**ANSWER:**

2. Identify all evidence you intend to introduce at any hearing or trial in this case, including but not limited to the names, addresses and last known addresses of all witnesses, the expected testimony of such witnesses and a description of all documents you intend to present into evidence.

**ANSWER:**

3. Identify each person whom you believe has knowledge regarding the allegations contained in Plaintiff's Complaint, or your Answer and Affirmative Defenses to the Complaint, and state the nature, scope and extent of each such person's knowledge.

**ANSWER:**

4. Identify each person, including each and every expert or potential expert, that you have contacted regarding any of the matters that are or may be at issue based upon any of the allegations or defenses included in the Plaintiff's Complaint or your Answer and Affirmative Defenses to the Complaint, and, with respect to each such person:

- a. Identify and describe the nature, scope and extent of each such person's knowledge;
- b. Identify each opinion, comment and/or communication made by or to that person regarding any of the matters that are or may be at issue in this litigation;
- c. State the basis for each such opinion and/or communication referenced in subpart b hereof;

- d. If that person is expected to testify in this matter, state the substance of that person's testimony;
- e. Identify all written reports or memoranda which that person prepared in connection with this case;
- f. Attach to your interrogatory answers copies of any written reports prepared in connection with this case;
- g. For all matters in which such person has given testimony in the last 10 years, identify the case name, case number, court where the action was/is pending, and the substance of that person's testimony and opinions; and
- h. Identify all articles, books, literature and other publications or papers on which that person will rely in connection with this case.

**ANSWER:**

Respectfully submitted,

/s/ Mark D. Roth

Mark D. Roth

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**PROOF OF SERVICE**

I, Mark Roth, an attorney, certify that I served the **Plaintiffs' First Set Of Interrogatories To City Of Chicago** by email transmission from [mark@rothfioretti.com](mailto:mark@rothfioretti.com) to the following persons at their email addresses shown below on or before 5:00 pm. on October 23, 2018.

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